IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

| Debtors. | & & & | (Jointly Administered) RE: Docket No. 1814 |
|---|---------------|---|
| CHESAPEAKE ENERGY CORPORATION, et al.,1 | § § | Case No. 20-33233 (DRJ) |
| In re: | § § | Chapter 11 |

CERTIFICATE OF COUNSEL WITH RESPECT TO DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE ASSUMPTION AND ASSIGNMENT OF CERTAIN BUREAU OF LAND MANAGEMENT AND BUREAU OF INDIAN AFFAIRS OIL AND GAS LEASES AND (II) GRANTING RELATED RELIEF

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for the above-captioned debtors (collectively, the "<u>Debtors</u>") certifies as follows:

- 1. On November 13, 2020, the Debtors filed their Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Bureau of Land Management and Bureau of Indian Affairs Oil and Gas Leases and (II) Granting Related Relief (the "Motion") [Docket No. 1814].
- 2. On November 24, 2020, the Debtors filed their revised proposed *Order* (I) Authorizing the Assumption and Assignment of Certain Bureau of Land Management and Bureau of Indian Affairs Oil and Gas Leases and (II) Granting Related Relief [Docket No. 1916].
- 3. The deadline for parties to file responses to the relief requested in the Motion was December 4, 2020 (the "Objection Deadline"). No objections to the Motion were filed on the

A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://dm.epiq11.com/chesapeake. The location of Debtor Chesapeake Energy Corporation's principal place of business and the Debtors' service address in these chapter 11 cases is 6100 North Western Avenue, Oklahoma City, Oklahoma 73118.

docket on or before the Objection Deadline. Counsel received informal comments which have been resolved by agreement. The substance of those agreements are reflected in the proposed form of order attached hereto.

4. The Debtors request that the Court enter the attached revised proposed order at the earliest convenience of the Court.

Houston, Texas December 10, 2020

/s/ Matthew D. Cavenaugh

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Certificate of Service

I certify that on December 10, 2020, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavenaugh
Matthew D. Cavenaugh